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July 22, 2005

RECEIVED

JUL 25 2005

Federal Communications Commission  
Office of Secretary

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Telecommunications Relay Services and Speech-to-Speech  
Services for Individuals with Hearing and Speech Disabilities  
CC Docket No. 98-67 and CG Docket No. 03-123  
Notice of Ex Parte Communication

Dear Ms. Dortch:

The purpose of this letter is to report that on July 21, 2005, James Lee Sorenson, Chief Executive Officer of Sorenson Communication, Inc. ("Sorenson"), and other representatives of Sorenson met with Chairman Kevin Martin, and Emily Willeford, Deputy Chief of Staff and International Advisor to Chairman Martin, concerning the above-referenced proceeding and issues concerning Video Relay Service ("VRS") providers. The other Sorenson representatives present include Pat Nola, Chief Operating Officer, Michael Maddix, VRS Product Manager, Rebecca Smith, Southern Regional Director of Interpreting Services, and Scott Ostermiller, Western Regional Outreach Manager.

During the meeting, the representatives from Sorenson discussed the Commission's rulings concerning telecommunications relay services ("TRS") released on July 19, 2005, interstate funding of VRS and federal regulation, enhanced 911 emergency calling capabilities of voice over Internet protocol (VoIP) providers, TRS rate determination methods, Interoperability and relay provider choice, and the development of improved VRS technologies. The representatives of Sorenson provided a visual representation (attached). A tour of the Sorenson VRS facility in Austin, Texas was also provided.

Marlene H. Dortch  
July 22, 2005  
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Pursuant to Section 1.1206 of the Commission's rules, an original<sup>1</sup> and three copies of this letter are being submitted to your office and copies of this letter are being sent to the participants.

Should you have any questions regarding this filing, please contact me.

Sincerely,



Sharon M. Bertelsen

cc: Chairman Kevin Martin  
Emily Willeford

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<sup>1</sup> The letter with the original signature will be submitted to the Commission on July 25, 2005.

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## **Sorenson Communications Position on Important VRS Issues**

## **Presentation Contents**

Company Snapshot

VRS Service Description

Regulatory Issues

Future Developments

Conclusion

## Company Snapshot

### 1995

Sorenson Vision established.

VisionLink, a training CD on ASL released

Sorenson Vision begins to invest 50+ million to create a high quality, low cost, and reliable videophone.

### 2003

Launch of Sorenson Video Relay Service (VRS)

Partnership developed with Gallaudet University

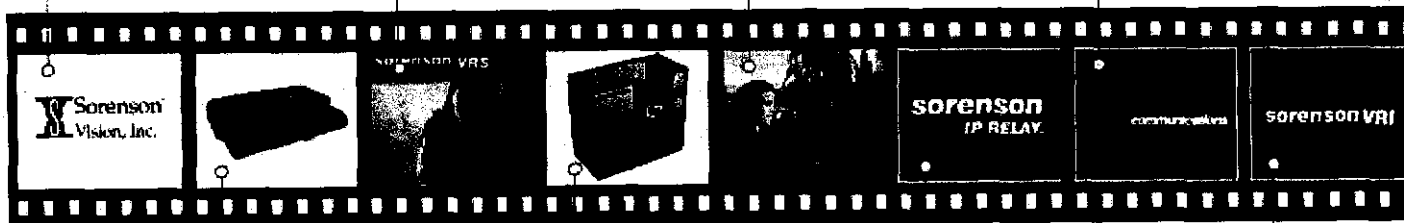
### 2005

Tens of thousands of video relay calls are placed weekly through Sorenson VRS

Proliferation of Sorenson VRS Interpreting Centers - opening two locations per month

### MID 2005

Sorenson Communications formed to focus on communication services and products



### 2002

Sorenson forms a partnership with D-Link to create VP-100 and i2eye videophones

### 2004

Sorenson releases industry's first videophone booths across the nation

Sorenson begins to offer 24/7 VRS service

### MID 2005

Launch of Sorenson IP Relay

### MID 2005

Launch of Sorenson VRI

US Postal Service contract awarded to Sorenson Communications

## **Sorenson VRS Service Description**

Sorenson VRS is based on proprietary technology platforms, designed with custom applications for deaf users.

### **Units are installed at no cost to consumers**

- VP-100 installation
- No reimbursement from the TRS fund
- Deaf Installer network
- Active outreach program

### **Interpreter and center expansion plans**

- 20 VRS centers with xx<sup>1</sup> under development
- 1,500+ interpreters
- Dynamically scaling to meet demand

1. xx Confidential material deleted. Confidential version filed separately.



## Sorenson VRS Interpreting Centers



**Legend**  
● Existing Centers  
XX² Centers Under Development

2. xx Confidential material deleted. Confidential version filed separately.

## **Regulatory Issues**

- FCC Rulings 7/14/05
- Interstate Funding of VRS/Federal Regulation
- TRS Rate Determination
- Interoperability and Relay Provider Choice



## **Support and Compliance with 7/14/05 FCC Rulings**

### **Speed of Answer Ruling**

- Sorenson fully supports and is in compliance
- Commission is correct in recognizing the interpreter shortage

### **24/7 Operations**

- Sorenson is the only VRS provider to provide 24/7 service (since October 2004)

### **Video Mail Payments**

- Sorenson has provided video mail (SignMail™) since April 2004

### **Spanish VRS**

- Sorenson will offer Spanish VRS in future

## **Interstate Funding/Federal Regulation of VRS/IP Relay**

**Apply Vonage decision (meets same criteria)**

- Use of the Internet to provide service
- The difficulty of identifying the customer's location
- The ability to manage the customer's service via the Internet

**Support healthy competition by centralizing oversight with FCC versus 50+ state regulatory bodies to ensure:**

- Choice of providers
- Innovation
- Low cost
- Good customer service

## **Interstate Funding/Federal Regulation of VRS/IP Relay**

### **Unreasonable Risk**

- Sorenson has invested tens of millions of dollars in VRS
- The commission authorized VRS providers to be compensated from the Interstate TRS Fund on an interim basis for all VRS calls. Interim basis makes risk of investment high for existing providers and new entrants
- Foresight of FCC has allowed nontraditional entrants like Sorenson to improve offering with innovations like the Sorenson VP-100

### **Lack of choice for users if retuned to state**

- Most states only allow one TRS provider
- The majority of users choose to use Sorenson VRS
- Sorenson would no longer be an option for most users

## **TRS Rate Determination**

- Weighted average discourages efficiency and reducing expenses
- Weighted average discourages new entrants and could cause smaller vendors to cease operations resulting in less relay choice
- Sorenson supports comments filed by HOVRS suggesting using the median provider cost to determine the rate<sup>3</sup>

3. Comments of Hands on Video Relay Service CC Docket 98-67 May 12, 2005 at 12.

## **Interoperability and Relay Provider Choice**

- Customers are free to choose among 8 VRS providers (unlike TTY)
- TRS regulations do not require consumer equipment interoperability
- Regulations should recognize and encourage private investment and free enterprise to innovate and compete with better technology and services
- Sorenson VP-100 users would be denied custom designed functionality (e.g. number pass through, videophone numbers, support services, future technology updates)
- Hearing users can reach a Sorenson VP-100 user from any VRS provider. Customers can choose providers
- VP-100 users can call any hearing or deaf person they want

## **Interoperability and Relay Provider Choice**

**VRS vendors can enter into cooperative working relationships to address issues and improve cross platform service levels**

- Mutually beneficial agreements to allow equipment interoperability (roaming example)
- Models of cooperative vendor agreements exist in other segments in the telecommunications industry
- Mutual cooperation is required for an all inclusive directory service
- Sorenson Communications invites mutually beneficial cooperative relationships with other VRS providers that would improve VRS

## **Future Developments**

Sorenson Communications continues to invest in technology to innovate and advance the communication needs of deaf and hard-of-hearing consumers in the following areas:

- Sorenson VP-200 videophone
- Sorenson VRS 911

## **Conclusion**

“Tell our friends that we have a proposition on foot to connect the deaf and hard-of-hearing for the purpose of personal communication, and in other ways to organize a grand video relay service system.”

- **Jim Sorenson** modified from a quote by Theodore Vail



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for more information visit:  
**[www.sorensonvrs.com](http://www.sorensonvrs.com)**